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July 7, 2023

Via ECF

The Honorable John G. Koeltl
United States District Judge
500 Pearl Street, Room 14A
New York, NY 10007

Re: Roche Freedman LLP v. Jason Cyrulnik, No. 1:21-cv-1746 (S.D.N.Y.)

Dear Judge Koeltl:

I write jointly on behalf of all parties. The parties have agreed, subject to Court approval, to serve their respective summary judgment opposition and reply papers on the dates set by the Court (Dkt. 414), but to file those same papers with the Court seven days after the current reply deadline to give the parties an opportunity to meet and confer on sealing issues, if needed, and avoid burdening the Court with unnecessary sealing motions and proposed redactions.

Thank you for your attention to this matter.

Respectfully,

/s/ Jonathan P. Bach

Jonathan P. Bach

Application granted. The parties should also consider whether they can resolve the current dispute with respect to sealing various materials, a dispute which is currently before the Magistrate Judge.
so ordered.

John G. Koeltl
7/7/23 u.s.d.s.